



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo
Building One Saint
Andrew's Plaza New
York, New York 10007

January 20, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Seth Markin and Brandon Wong*, 22 Cr. 395 (ER)

Dear Judge Ramos:

The Government respectfully writes to request that the Court (1) exclude time under the Speedy Trial Act, and (2) extend two briefing deadlines in connection with defendant Seth Markin's pretrial motions (Dkt. 42).

First, the Government requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), which was previously excluded until today, through a control date of June 20, 2023. Defendant Seth Markin has filed pretrial motions, which are pending, and consents to this requested exclusion of time. Defendant Brandon Wong has not filed motions, and consents to this requested exclusion of time. The requested exclusion of time under the Speedy Trial Act will permit the defendants' continued review of discovery and permit the parties to engage in discussions regarding potential pretrial resolutions of this case. The Government respectfully submits that the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

Second, the Government respectfully requests a one-week extension of its January 30, 2023 deadline to respond to defendant Seth Markin's pretrial motions. The Government requests an extension until February 6, 2023, and a corresponding extension of the defendant's reply brief to

February 13, 2023. The defendant has no objection to the proposed revised schedule. This is the first request for an extension of these deadlines.

Respectfully submitted,

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Cc: All Counsel of Record
(By ECF)